

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY
RIFLE & PISTOL CLUBS, INC., et
al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

MARK CHEESEMAN, et al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

BLAKE ELLMAN, et al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

Civil Action No. 3:18-cv-10507-PGS-LHG

Civil Action No. 3:22-cv-4360-PGS-
LHG

Civil Action No. 1:22-cv-4397-PGS-LHG

**DECLARATION OF SCOTT BACH IN SUPPORT OF THE
MOTION FOR SUMMARY JUDGMENT OF ASSOCIATION OF**

NEW JERSEY RIFLE & PISTOL CLUBS, INC. (“ANJRPC”)
PLAINTIFFS AND ELLMAN PLAINTIFFS

1. I, Scott L. Bach, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge.

2. I am Executive Director and a Regional Vice President of the Association of New Jersey Rifle & Pistol Clubs, Inc. (“ANJRPC”), a plaintiff in two of the above-titled consolidated actions. I am over the age of 18. I am authorized to speak and testify on behalf of ANJRPC as to the matters set forth in this Declaration.

3. I have personal knowledge of the matters set forth herein.

4. ANJRPC is a nonprofit membership corporation, incorporated in the State of New Jersey in 1936, which represents its members. Its mailing address is 5 Sicomac Road, Suite 292, North Haledon, New Jersey 07508.

5. ANJRPC represents the interests of target shooters, hunters, competitors, outdoors people, and other law-abiding firearms owners. Among the ANJRPC’s purposes is aiding such persons in every way within its power and supporting and defending the people’s right to keep and bear arms, including the right of its members and the public to purchase and possess firearms and magazines. The New Jersey restrictions on magazine size and common semi-automatic firearms at issue in these consolidated cases are thus a direct affront to ANJRPC’s central mission. ANJRPC has many thousands of members who reside in New Jersey. ANJRPC brings the claims herein on behalf of its members.

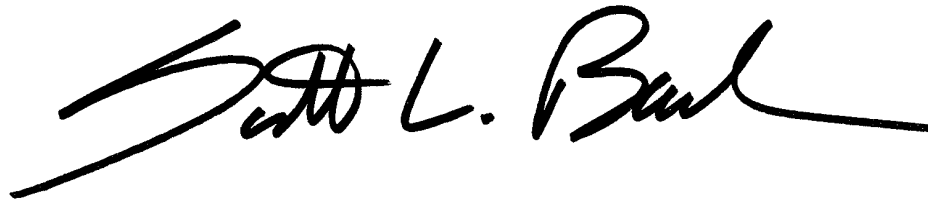
6. ANJRPC has members, including Plaintiffs Blake Ellman and Marc Weinberg, who wish to acquire—and but for the challenged laws would acquire—for purposes of self-defense or other lawful purposes a magazine that qualifies as a “large capacity ammunition magazine” or a firearm that qualifies as an “assault firearm” due to its magazine capacity under the revised definitions of those terms enacted by the challenged laws.

7. ANJRPC has members who owned and kept in New Jersey ammunition magazines that qualified as “large capacity” or firearms that qualified as “assault firearms” due to their magazine capacity under the revised definitions of those terms enacted by the challenged laws. But for these laws, ANJRPC members would have continued to possess these magazines and firearms in New Jersey for lawful purposes, including self-defense in the home.

8. ANJRPC has members, including Plaintiffs Ellman and Thomas Rogers, who wish to acquire—and but for the ban would acquire—one or more of the banned common semi-automatic firearms for purposes of self-defense in the home or other lawful purposes. Such members would apply for a license to possess common semi-automatic firearms, but they believe that such an attempt would be futile and they would be denied.

I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States.

DATED: October 6, 2023

A handwritten signature in black ink, reading "Scott L. Bach". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

SCOTT BACH